BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	Rulemaking 15-02-020 (Filed February 26, 2015)

2015 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF ENERCAL USA, LLC (DBA YEP ENERGY)

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May 24, 2016

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OF THE STATE OF CALIFORNIA

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I. INTRODUCTION

In accordance with the May 28, 2015 Assigned Commissioner's Revised Ruling Identifying Issues and Schedule of Review for 2015 Renewables Portfolio Standard Plans ("ACR"), EnerCal USA, LLC (dba Yep Energy) ("EnerCal") hereby submits this 2015 Renewables Portfolio Standard Procurement Plan ("RPS Plan"). EnerCal's registration with the Commission as an Electric Service Provider ("ESP") became effective October 14, 2010 (ESP #1080). To date, however, EnerCal has not signed up any retail electricity customers and does not serve any direct access load in California. EnerCal's responses to sections 6.1 through 6.6, 6.13, and 6.15 of the ACR are set forth below.

II. RPS PROCUREMENT PLAN

6.1. Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

If and when EnerCal begins to serve direct access load in California, EnerCal plans to meet its RPS obligations through a mix of bundled and REC-only transactions. EnerCal's exact RPS compliance portfolio mix will reflect the applicable Portfolio Content Category requirements and limitations and will largely be dependent on the pricing of the various RPS-

eligible products available. EnerCal does not have any specific plans to diversify its overall RPS portfolio in response to grid integration issues or the potential for overgeneration. EnerCal also does not expect to make any direct capital investments in new renewable generation capacity during the 2015-2025 planning period; however, EnerCal will comply with the applicable minimum long-term contracting requirements, which will indirectly support the development of new renewable generation capacity. Lastly, EnerCal anticipates that its RPS procurement strategy will remain largely the same regardless of whether the applicable RPS is 33% or is some higher percentage (e.g., under the 50% RPS program).

6.2. Project Development Status Update - § 399.13(a)(5)(D)

EnerCal has not entered into any contracts with facilities that are not yet in commercial operation. Consequently, EnerCal has no information to report in this section.

6.3. Potential Compliance Delays - § 399.13(a)(5)(B)

In the event that EnerCal begins to serve direct access load during the 2014-2016 compliance period, EnerCal does not anticipate any compliance delays given the straightforward nature of EnerCal's RPS procurement strategy (see Section 6.1 above). If, however, fundamental barriers to the development of new renewable generation facilities that may be needed to meet the state's overall 33% RPS goal arise during the 2015-2034 forecast period, any corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for EnerCal and other load serving entities. If and when any such potential compliance delays become evident, EnerCal will identify those barriers in future RPS Plans and address the steps it plans to take to account for and minimize their impact on the company's RPS compliance.

6.4. Risk Assessment - § 399.13(a)(5)(F)

EnerCal has not entered into any contracts with facilities that are not yet in commercial operation. Consequently, EnerCal has no information to report in this section.

6.5. Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)

Please see Appendix A attached hereto.

6.6. "Minimum Margin of Procurement" - § 399.13(a)(4)(D)

EnerCal has not entered into any contracts with facilities that are not yet in commercial operation. Consequently, EnerCal has no information to report in this section.

6.13. Important Changes to Plans Noted

This section is inapplicable to EnerCal as this is the company's first RPS Plan.

6.15. Safety Considerations

Given that EnerCal does not own, operate or control any RPS-eligible generation facilities, the company's RPS plan does not give rise to any safety considerations.

III. RESPONSES TO RESIDUAL NET SHORT QUESTIONS

RPS Compliance Risk

1. **How do current and historical performance of online resources in your RPS portfolio impact future projections of RPS deliveries and your subsequent RNS?**

There is no impact, as EnerCal currently does not have any RPS contracts with forward delivery obligations that are dependent on the performance of a specific RPS-eligible generator.

2. **Do you anticipate any future changes to the current bundled retail sales forecast? If so, describe how the anticipated changes impact the RNS.**

As a non-utility retail seller, EnerCal does not forecast "bundled retail sales."

3. **Do you expect curtailment of RPS projects to impact your projected RPS deliveries and subsequent RNS?**

No, unless the impact is so large as to impair the ability of non-utility retail sellers to meet their RPS obligations.

4. **Are there any significant changes to the success rate of individual RPS projects that impact the RNS?**

EnerCal has no information on this subject.

5. **As projects in development move towards their COD, are there any changes to the expected RPS deliveries? If so, how do these changes impact the RNS?**

EnerCal has no information on this subject.

RECs above the Procurement Quantity Requirement

6. **What is the appropriate amount of RECs above the PQR to maintain? Please provide a quantitative justification and elaborate on the need for maintaining banked RECs above the PQR.**

This topic is not applicable to EnerCal, as the company is not under any requirement to procure RECs in excess of the company's RPS obligations.

7. **What are your strategies for short-term management (10 years forward) and long-term management (10-20 years forward) of RECs above the PQR? Please discuss any plans to use RECs above the PQR for future RPS compliance and/or to sell RECs above the PQR.**

Please see EnerCal's response to Question 6.

Voluntary Margin of Over-Procurement

8. **Provide VMOP on both a short-term (10 years forward) and long-term (10-20 years forward) basis. This should include a discussion of all risk factors and a quantitative justification for the amount of VMOP.**

Please see EnerCal's response to Question 6.

9. **Please address the cost-effectiveness of different methods for meeting any projected VMOP procurement need, including application of forecast RECs above the PQR.**

Please see EnerCal's response to Question 6.

Cost-effectiveness

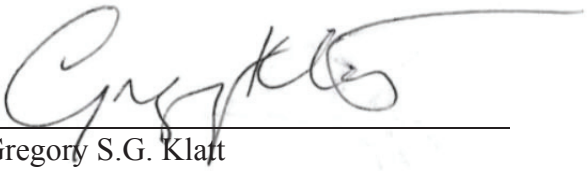
10. Are there cost-effective opportunities to use banked RECs above the PQR for future RPS compliance in lieu of additional RPS procurement to meet the RNS?

EnerCal currently has no opinion on this topic.

11. How does your current RNS fit within the regulatory limitations for PCCs? Are there opportunities to optimize your portfolio by procuring RECs across different PCCs?

EnerCal currently has no opinion on this topic.

Respectfully submitted,



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May 24, 2016

VERIFICATION

I, Gregory Veiseh, Executive Vice President of Supply for EnerCal USA, LLC (dba Yep Energy), am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing 2015 Renewables Portfolio Standard Procurement Plan filed in Rulemaking 15-02-020 are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on May 24, 2016, at Houston, Texas.

/s/

Gregory Veiseh
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APPENDIX A

Variable	Calculation	Item	prior to Reporting Year	2011 Actuals	2012 Actuals	2013 Actuals	2011-2013	2014 Actuals	2015 Forecast	2016 Forecast	2014-2016	2017 Forecast	2018 Forecast	2019 Forecast	2020 Forecast	2017-2020	2021 Forecast	2022 Forecast	2023 Forecast	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast	2031 Forecast	2032 Forecast	2033 Forecast	2034 Forecast
		Forecast Year		-	-	-	CP1	-	1	2	CP2	3	4	5	6	CP3	7	8	9	10	11	12	13	14	15	16	17	18	19	20
		Annual RPS Requirement																												
A		Bundled Retail Sales Forecast (LTPP)		0.000	0.000	0.000	0.000	0.000	0.000	0.000	-																			
B		RPS Procurement Quantity Requirement (%)		20.0%	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	23.3%	27.0%	29.0%	31.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%	33.0%
C	A*B	**Gross RPS Procurement Quantity Requirement (GWh)**		-	-	-	-	-	-	-	-																			
D		Voluntary Margin of Over-procurement		-	-	-	-	-	-	-	-																			
E	C+D	**Net RPS Procurement Need (GWh)**		-	-	-	-	-	-	-	-																			
		RPS-Eligible Procurement																												
Fa		Risk-Adjusted RECs from Online Generation		-	-	-	-	-	-	-	-																			
Faa		Forecast Failure Rate for Online Generation (%)																												
Fb		Risk-Adjusted RECs from RPS Facilities in Development																												
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)																												
Fc		Pre-Approved Generic RECs																												
Fd		Executed REC Sales																												
F	Fa + Fb +Fc - Fd	Total RPS Eligible Procurement (GWh)		-	-	-	-	-	-	-	-																			
F0		Category 0 RECs		-	-	-	-																							
F1		Category 1 RECs		-	-	-	-	-	-	-	-																			
F2		Category 2 RECs		-	-	-	-	-	-	-	-																			
F3		Category 3 RECs		-	-	-	-	-	-	-	-																			
		Gross RPS Position (Physical Net Short)																												
Ga	F-E	**Annual Gross RPS Position (GWh)**		-	-	-	-	-	-	-	-																			
Gb	F/A	**Annual Gross RPS Position (%)**		0	0	0	0	0	0	0	0																			
		Application of Bank																												
Ha	H - Hc (from previous year)	Existing Banked RECs above the PQR																												
Hb		RECs above the PQR added to Bank																												
Hc		Non-bankable RECs above the PQR																												
H	Ha+Hb	Gross Balance of RECs above the PQR																												
Ia		Planned Application of RECs above the PQR towards RPS Compliance																												
Ib		Planned Sales of RECs above the PQR																												
J	H-Ia-Ib	Net Balance of RECs above the PQR																												
J0		Category 0 RECs																												
J1		Category 1 RECs																												
J2		Category 2 RECs																												
		Expiring Contracts																												
K		RECs from Expiring RPS Contracts																												
		Net RPS Position (Optimized Net Short)																												
La	Ga + Ia – Ib - Hc	**Annual Net RPS Position after Bank Optimization (GWh)**																												
Lb	(F + Ia - Ib - Hc)/A	**Annual Net RPS Position after Bank Optimization (%)**																												

Note: Fields in grey are potected as Confidential under CPUC Confidentiality Rules

Note: Values are shown in GWhs